



ATTORNEYS AT LAW

38TH FLOOR ONE OXFORD CENTRE PITTSBURGH, PA 15219  
412.263.2000 FAX: 412.263.2001  
WWW.PIETRAGALLO.COM

DIRECT DIAL NO.: 412.263.1816  
DIRECT FAX NO: 412.263.4246  
FILE NO.: MYLAN-112578  
EMAIL: cct@pietragallo.com

February 15, 2022

**Via ECF**

Special Master the Hon. Thomas Vanaskie  
Stevens & Lee  
1500 Market Street, East Tower  
18th Floor  
Philadelphia, PA 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*  
USDC, District of New Jersey, No. 1:19-md-2875-RBK

Dear Judge Vanaskie:

I write on behalf of the Defendants' Executive Committee to provide Defendants' positions with respect to the topics on the agenda for the conference with the Court on Wednesday, February 16, 2022.

**1. Request for Extension of Upcoming Deadlines involving Class Certification and Rule 702 Hearing**

The parties are in the process of meeting and conferring regarding a potential request to the Court to extend upcoming case management deadlines related to class certification and the Rule 702 Hearing. Specifically, Plaintiffs have requested to re-schedule the depositions of several of Defendants' class certification expert witnesses due to the Rule 702 Hearing regarding general causation. Notably, these depositions were set prior to the Court's scheduling of the Rule 702 Hearing, and many of the witnesses are not available to be deposed on another date prior to the current March 10, 2022 deadline to complete these depositions. Defendants have sought to accommodate Plaintiffs' requests, but rescheduling these depositions beyond the present deadline

Special Master the Honorable Thomas Vanaskie

February 15, 2022

Page 2

will impact the Defendants' ability to meet the March 22, 2022 deadline to submit their opening briefs in opposition to Plaintiffs' class certification motions. As a result, the parties have discussed a two or three-week extension of all class certification deadlines. Additionally, the parties have also discussed the possibility of postponing the Rule 702 Hearing by a few weeks to allow additional time for completion of class certification expert depositions and preparation for the Hearing. Defendants will be prepared to address this matter with the Court at the Status Conference.

**2. Update regarding status of Putative Class Representatives Raleigh Wolfe, Celestine Daring, and Richard O'Neil**

Plaintiffs have agreed to voluntarily dismiss these claims, and have filed dismissals regarding the same.

Respectfully submitted,



Clem C. Trischler

c: All counsel of record (via ECF)